

**BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Related Charges	Fiscal Years 2019-2021
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**PHILADELPHIA WATER DEPARTMENT'S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
(SET IV)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Water Department ("Department" or "PWD") requests that the Public Advocate provide full and complete answers to the following interrogatories with seven (7) calendar days of service hereof.

**Instructions and Definitions**

1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.
2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.
3. Copies of all answers shall be provided in PDF and/or XLS format via email.
4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.

**Interrogatories**

**PWD-IV-1.** With respect to the testimony of Jerome Mierzwa (PA Statement 2, Schedule JDM-1), please provide the following:

- (a) workpapers supporting the extra capacity demand factors;
- (b) any consumption data relied upon in your analysis;
- (c) diversity factor calculation; and
- (d) if no diversity factor calculated, please explain how diversity is recognized in your analysis.

**PWD-IV-2.** With respect to the testimony of Jerome Mierzwa (PA Statement 2, Schedule JDM-1), please confirm that the calculation of extra capacity demand factors was undertaken in accordance with AWWA guidelines, as set forth in Principles of Water Rates, Fees and Charges – AWWA M1 (Appendix A).

**PWD-IV-3.** With respect to the testimony of Jerome Mierzwa (PA Statement 2, page 16), please provide the revised cost of service model used to calculate the data shown in Table 1.

**PWD-IV-4.** With respect to the testimony of Jerome Mierzwa (PA Statement 2 at page 16), please identify the source for revenues depicted for Wholesale service in columns 1 and 2 of Table 1. Also please explain why revenues for Wholesale service in Column 2 are decreasing.

**PWD-IV-5.** With respect to the testimony of Jerome Mierzwa (PA Statement 2 at page 7), please identify other jurisdictions that you are aware of where costs for fire protection services are recovered from retail customers through meter size-based service charges.

**PWD-IV-6.** With respect to the testimony of Lafayette Morgan (PA Statement 1), please identify those municipal proceedings in which you have testified, or assisted in the preparation of testimony, where multiple rate periods were used.

- (a) Please provide the case caption, PUC docket numbers and year for each proceeding identified above.
- (b) If you have the PUC decisions in your file, please provide a copy of same.
- (c) Please summarize your testimony in support of or in opposition to the use of multiple rate periods in each proceeding identified in response to this interrogatory.

Respectfully submitted,

/s/ Andre C. Dasent

ANDRE C. DASENT, ESQUIRE  
Attorney for Philadelphia Water Department  
1500 Market Street, 12<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19102  
(215) 625-0555

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